

MILBANK

Mr. Mitchell Smith
Superintendent Waste Water Treatment Plant
1501 West Markland Ave
Kokomo, IN 46901

Dear Mr. Smith:

On January 6, 1998, we had a high zinc reading of 5.86, which is above our limits. We received these results on January 13, 1998, and these results were reported to Mark Mc Giver on January 14, 1998 during his visit.

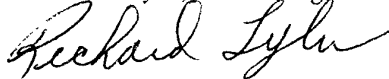
We discovered that on January 6th, 1998 the float valve on our number 1 tank did not shut off and the tank ran over onto the floor. In cleaning the spill, some of the contents of the tank were squeezed down the drain. Since this occurrence, we have installed new floats to prevent a reoccurrence. We are also going to build a 3 or 4 inch dike all around our collection pit.

In addition, we are working on an accidental spill prevention plan which should be completed in the near future. In the mean time, we are monitoring our system very closely.

If you have any questions regarding this matter please feel free to contact me.

Sincerely,

Richard Tyler, Plant Manager



MILBANK

February 11, 1998

Mr. Mitchell Smith
Superintendent Waste Water Treatment Plant
1501 W. Markland Ave.
Kokomo, In 46901

Dear Mr. Smith:

On January 15, 1998, we had an exceedance on our zinc level. The reading was 2.370 our maximum per day is 2.100. The only reason that can be found for this high reading was that on that particular day, they were overflowing the rinse tank at too high of a rate.

Those parties involved have been instructed as to the amount of flow from the tank going down the drain.

We have also changed supervisors in that department so as to try to get better monitoring of the system.

Sincerely,

MILBANK MFG. CO., INC.



Richard L. Tyler
Plant Manager

MILBANK

Mr. Mitchell Smith
Superintendent Waste Water
Treatment Plant
1501 W. Markland Ave.
Kokomo, IN 46901

Dear Mr. Smith:

This letter is confirming our many excesses of zinc for this month. These excesses have been verbally reported to either Mark McGiver or yourself. The overages have been as follows:

| | | |
|-------------------|---------|------|
| Sample collected: | 2/3/98 | 4.22 |
| | 2/5/98 | 6.86 |
| | 2/10/98 | 8.42 |
| | 2/12/98 | 9.36 |
| | 2/17/98 | 3.83 |
| | 2/19/98 | 7.30 |
| | 2/24/98 | 4.11 |

| | | |
|---------------------|---------|------|
| Resamples collected | 2/13/98 | 9.16 |
| | 2/18/98 | 4.39 |
| | 2/20/98 | 6.27 |
| | 2/23/98 | 5.81 |

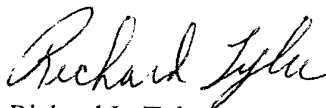
These results are after a thorough cleaning of all tanks and the reversal of our rinse water overflow. All of these changes that we have done thus far have gotten us further out of compliance. As you should know this is the reason that Milbank Mfg., is going to have a treatment facility installed.

The persons involved will be here March 3, for a discussion and confirming of plans for this system.

If you have any questions regarding this matter, feel free to contact me.

Sincerely,

MILBANK MFG., CO., INC.



Richard L. Tyler
Plant Manager

April 9, 1998

Mr. Mitchell Smith
Superintendent Waste Water Treatment Plant
1501 West. Markland Ave.
Kokomo, In 46901

Dear Mr. Smith:

This letter is to explain our exceedence for a high zinc reading. As you may know, we were having Asbury Laboratory do our testing. We were getting some very high readings so we had Net Lab do some testing. Their readings were much lower, taken on the same date.

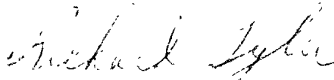
As of now we have switched to Net Lab for our testing. Some of the discrepancies were as follows:

| | Net Lab | Absurd |
|--------|---------|--------|
| 3/3/98 | 1.90 | 3.15 |
| 3/5 | 1.60 | 2.53 |
| 3/10 | 1.50 | 2.46 |
| 3/12 | 1.50 | 2.52 |
| 3/17 | 1.80 | 3.47 |
| 3/19 | 2.20 | 2.77 |
| 3/24 | 1.70 | |
| 3-26 | | |
| 3-30 | | |

We are also coming along and getting ready for out treatment facility.

Sincerely,

MILBANK MFG CO., INC.


Richard L. Tyler
Plant Manager

April 16, 1998

Mr. Mitchell Smith
Superintendent Waste Water Treatment Plant
1501 West Markland Ave.
Kokomo, IN 46901

Dear Mr. Smith:

On April 14, 1998 we received a call from NET lab which is doing our twice weekly sampling that due to failure of their auto sampler there will be no sample for April 9 and 10. The April 6 and 7 was collected all right.

A copy of this fax stating this is enclosed.

If you have any questions please contact me.

Sincerely,

MILBANK MFG. CO., INC.

Richard L. Tyler
Plant Manager

MIL0000533



NATIONAL
ENVIRONMENTAL
TESTING, INC.

Indianapolis Division
6964 Hillside Ct.
Indianapolis, IN 46250
Tel: (317) 842-4261
Fax: (317) 842-4286

April 14, 1998

Mr. Richard Tyler
MILBANK MANUFACTURING CO.
1400 E. Haven Street
Kokomo, IN 46901-3188

Mr. Tyler:

Due to an auto-sampler failure, only one wastewater sample could be collected for the week of April 6. An attempt was made to collect a composite sample on April 9-10, but the malfunction of the auto-sampler occurred before the end of the cycle.

A composite sample was successfully collected on April 6-7.

If you have any questions or comments, please feel free to reach me at 317-842-4261.

Sincerely,

Ron Barnett
Project Representative

May 8, 1998

Mr. Mitchell Smith
Superintendent Waste Water Treatment Plant
1501 West Markland Ave
Kokomo, IN 46901

Dear Mr. Smith:

We have had several high zinc readings which are as follows:

4/7/98 = 3.00
4/9/98 = No sample taken ; Sampler malfunction. Letter was sent concerning
this occurrence.
4/14/98= 3.40
4/16/98=4.60
4/21/98=3.50
4/23/98=3.80
4/28/98=4.20

We believe these high readings are due to the fact that our rinse tanks need to be cleaned.
They have not been cleaned due to the fact we have been building our containment area
moving our precipitating tank , having the floor sealed in our containment area. The tank
has been moved and we will clean our tanks on 5/9/98.

The pretreatment systems has been received at our location and is in its close
approximation of where it will actually be located.

If you or any of the pretreatment team would like to check on our progress at any time,
please feel free to come by.

Sincerely,

MILBANK MFG. CO., INC.

Richard L. Tyler
Plant Manager

June 9, 1998

Mr. Mitchell Smith
Superintendent Waste Water Treatment Plant
1501 W. Markland Ave.
Kokomo, IN 46901

Dear Mr. Smith:

This letter is in regards to the one high zinc reading that we had in the month of May.

The reading which was taken on the 27th of May was 2.2. Mark McIver was called on 6/2/98 and was given the verbal results. This seems to be some kind of spike and at this time no other exceedances have been reported .

Our water treatment facility has been installed and we are now waiting on our state permit to operate the system.

Feel free to drop in and check out our new system at any time.

Sincerely,

Richard L. Tyler
Plant Manager

MIL0000536